

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

STATE OF WASHINGTON, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official
capacity as President of the United States of
America, et al.,

Defendants.

NO.

DECLARATION OF S.B.

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ATTORNEY GENERAL OF WASHINGTON
Complex Litigation Division
800 Fifth Avenue, Suite 2000
Seattle, WA 98104
(206) 464-7744

1 I, S.B., declare as follows:

2 1. I am over the age of 18, competent to testify as to the matters herein, and make
3 this declaration based on my personal knowledge.

4 2. I am the parent of two girls, the eldest is thirteen years old and the youngest is
5 nine years old. We live in Seattle. I am an attorney and currently work as the legal director of a
6 non-profit organization.

7 3. My youngest child, F.B., is transgender. She was assigned male sex at birth, but
8 her gender identity is female.

9 4. I am choosing to use initials because I am fearful for her and my family's safety
10 due to the heightened anti-trans rhetoric in the current political climate.

11 5. From around three years of age, F.B. began asserting that she was a girl. She
12 preferred traditionally feminine clothing and toys. She selected a new name for herself, Bubbles,
13 because she did not identify with the male name chosen for her at birth. Everyone around her
14 knew she was a girl and treated her as one.

15 6. When it was time for her to start kindergarten, we talked about officially changing
16 her name to a traditionally female name. She and I selected the name that is now listed in her
17 birth certificate.

18 7. Her first year of kindergarten happened during the pandemic. Classes were
19 mostly virtual, and all her classmates had only known F.B. as a girl. When it was time to go back
20 to in-person classes, F.B. started having anxiety about her friends finding out that she was
21 transgender. She would avoid going to the school bathroom at all costs and would only go if a
22 teacher would stand outside her door to make sure no one would walk in on her or peek while
23 she was in the stall. She started showing anxiety symptoms and committed self-harm due to these
24 fears. She would often say that she did not like herself and talk about hurting herself.

25 8. I started taking F.B. to therapy to treat these symptoms and the therapist advised
26 her to start taking anxiety medication. With the support of her teachers, she decided to come out

1 to her classmates and tell everyone that she was transgender in the hopes of alleviating her
2 anxiety. A representative from Seattle Public Schools (SPS) was present in the classroom and
3 spoke to the children about what being transgender means. They made F.B. feel safe and
4 supported.

5 9. F.B.'s anxiety subsided after she came out to her classroom, and she no longer
6 felt like she was hiding a big secret from her friends.

7 10. F.B. is now in fourth grade. Conversations about adolescence and puberty being
8 on the horizon started happening at school and with friends. She started having anxiety about
9 waking up one day and discovering that she now looked like a grown boy. F.B. talked to me
10 about her fears, and I encouraged her to talk with our family doctor about her concerns at her
11 next check-up.

12 11. F.B. asked her doctor when she should start puberty blockers. The doctor
13 reassured her it was too early, that F.B. was not showing any signs of puberty yet. This advice
14 put her at ease for a while, but recently she started having panic attacks about going through
15 puberty without the blockers.

16 12. For these reasons, I have not told her about President Trump's Executive Order
17 that intends to block all type of gender-affirming care for minors. It would make her worst
18 nightmares a potential reality and wreck her mental health. I am convinced, based on her past
19 behavior and our frequent conversations on this issue, that if F.B. could not get access to puberty
20 blockers when she goes through puberty, she would become suicidal.

21 13. If F.B. is not able to obtain gender-affirming care in this country, we would have
22 to move to another country where she could get the help she needs. Leaving the United States
23 would be incredibly tough on our family. F.B. has a community that loves and supports her in
24 Seattle. She loves this city. She's passionate about marine biology, and her favorite hobby is
25 going to Golden Parks tidepools and teaching other children about the cool animals she
26 recognizes and knows about.

14. I have been living in Seattle since 2003 and have a job here I love and need. We would also have to face tough decisions regarding separating the two sisters, since my eldest's other parent lives in Seattle. But moving would be absolutely necessary in order to protect F.B.'s mental health and her life.

15. According to the terms of the Executive Order, I could be criminally prosecuted if I were to do something like that to help my daughter. It baffles me that these sacrifices I would make for F.B. would be considered child abuse and I could lose custody of her. It is a terrifying prospect.

16. I have decided to use initials in this declaration to protect F.B. and my family from any acts of violence. The anti-trans rhetoric is heightened in the present and I worry people would seek revenge against us if they know we are speaking against this Executive Order.

I declare under penalty of perjury under the laws of the State of Washington and the United States of America that the foregoing is true and correct.

DATED this 4th day of February 2025, at Seattle, Washington.

S.B.
S.B.
Parent of F.B.